

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS

In Re:  
American Achievement Corporation  
Debtor(s)

§  
§  
§  
§ Case No.: 21-30058-hdh11  
Chapter No.: 11

**SUMMONS TO DEBTOR IN AN INVOLUNTARY CASE**

A petition under Title 11, United States Code was filed against you on 1/14/2021 in this Bankruptcy Court, requesting an order for relief under 11 of the Bankruptcy Code (Title 11 of the United States Code).

**YOU ARE SUMMONED** and required to submit to the Clerk of the Bankruptcy Court, a motion or answer to the petition within 21 days after the service of this summons. A copy of the petition is attached.

Address of Clerk:  
United States Bankruptcy Court  
1100 Commerce Street  
Room 1254  
Dallas, TX 75242

At the same time, you must also serve a copy of the motion or answer on the petitioner's attorney.

Attorney's Address:  
Lydia Rogers Webb  
Gray Reed and McGraw LLP  
1601 Elm St., Ste. 4600  
Dallas, TX 75201

If you make a motion, your time to serve an answer is governed by Bankruptcy Rule 1011(c).

**IF YOU FAIL TO RESPOND TO THIS SUMMONS, THE ORDER FOR RELIEF WILL BE ENTERED.**

DATED: 1/15/21

FOR THE COURT:  
Robert P. Colwell, Clerk of Court

by: /s/J. Bergreen, Deputy Clerk



In Re: American Achievement Corporation  
Case No. 21-30058-hdh11

## CERTIFICATE OF SERVICE

I, Lydia R. Webb

of\*\* Gray Reed & McGraw LLP

certify:

That I am, and at all times hereinafter mentioned was, more than 18 years of age;

That on the 20th day of January, 2021 I served a copy of the within summons, together with the complaint filed in this proceeding, on

**American Achievement Corporation** and

**C T CORPORATION SYSTEM**

the alleged debtor in this case, by *{describe here the mode of service}*

**via U.S. First Class mail, postage prepaid**

the said alleged debtor at

**1550 W. Mockingbird Lane** and  
**Dallas, Texas 75236**  
**Attn: Robert Myers, CEO**

**1999 BRYAN ST., STE. 900**  
**DALLAS, TX 75201**

Under penalty of perjury, I declare that the foregoing is true and correct.

January 20, 2021

(Date)

/s/ Lydia R. Webb

(Signature)

Print Name: Lydia R. Webb - Gray Reed & McGraw LLP

Business Address: 1601 Elm Street, Suite 4600

City: Dallas State: TX Zip: 75201

\*\* same as above

*State mailing address*

**Fill in this information to identify the case:**

United States Bankruptcy Court for the:

Northern District of Texas  
(State)

Case Number (if known): \_\_\_\_\_ Chapter 11

 Check if this is an amended filing**Official Form 205****Involuntary Petition Against a Non-Individual**

12/15

Use this form to begin a bankruptcy case against a non-individual you allege to be a debtor subject to an involuntary case. If you want to begin a case against an individual, use the *Involuntary Petition Against an Individual* (Official Form 105). Be as complete and accurate as possible. If more space is needed, attach any additional sheets to this form. On the top of any additional pages, write debtor's name and case number (if known).

**Part 1 Identify the Chapter of the Bankruptcy Code Under Which Petition Is Filed**

1. Chapter of the Bankruptcy Code

Check one:

 Chapter 7 Chapter 11**Part 2 Identify the Debtor**

2. Debtor's Name

American Achievement Corporation

3. Other names you know debtor has used in the last 8 years

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Include any assumed names, trade names, or doing business as names.

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4. Debtor's federal Employer Identification Number (EIN)

 Unknown**13-4126506**

5. Debtor's address

Principal place of business

**1550 W. Mockingbird Lane**

Number Street

**Dallas Texas 75235**

City State ZIP Code

**Dallas****County**

Mailing address, if different

Number Street

**P.O. Box**

City State ZIP Code

**Location of principal assets, if different from principal place of business**

Number Street

City State ZIP Code

6. Debtor's website (URL)	<hr/>		
7. Type of debtor	<input checked="" type="checkbox"/> Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP)) <input type="checkbox"/> Partnership (excluding LLP) <input type="checkbox"/> Other type of debtor. Specify: _____		
8. Type of debtor's business	<i>Check one:</i> <input type="checkbox"/> Health Care Business (as defined in 11 U.S.C. § 101(27A)) <input type="checkbox"/> Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B)) <input type="checkbox"/> Railroad (as defined in 11 U.S.C. § 101(44)) <input type="checkbox"/> Stockbroker (as defined in 11 U.S.C. § 101(53A)) <input type="checkbox"/> Commodity Broker (as defined in 11 U.S.C. § 101(6)) <input type="checkbox"/> Clearing Bank (as defined in 11 U.S.C. § 781(3)) <input checked="" type="checkbox"/> None of the types of business listed. <input type="checkbox"/> Unknown type of business.		
9. To the best of your knowledge, are any bankruptcy cases pending by or against any partner or affiliate of this debtor?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Debtor <u>AAC Holding Corp.</u> Relationship <u>Affiliate</u> District <u>Northern District of Texas</u> Date filed <u>01/14/2021</u> Case number, if known _____ MM/DD/YYYY  Debtor _____ Relationship _____ District _____ Date filed _____ Case number, if known _____ MM/DD/YYYY		

### Part 3 Report About the Case

10. Venue	<i>Check one:</i> <input checked="" type="checkbox"/> Over the last 180 days before the filing of this bankruptcy, the debtor had a domicile, principal place of business, or principal assets in this district longer than in any other district. <input checked="" type="checkbox"/> A bankruptcy case concerning debtor's affiliates, general partner, or partnership is pending in this district.		
11. Allegations	Each petitioner is eligible to file this petition under 11 U.S.C. § 303(b). The debtor may be the subject of an involuntary case under 11 U.S.C. § 303(a).		
	<i>At least one box must be checked:</i> <input checked="" type="checkbox"/> The debtor is generally not paying its debts as they become due, unless they are the subject of a bona fide dispute as to liability or amount. <input type="checkbox"/> Within 120 days before the filing of this petition, a custodian, other than a trustee, receiver, or an agent appointed or authorized to take charge of less than substantially all of the property of the debtor for the purpose of enforcing a lien against such property, was appointed or took possession.		
12. Has there been a transfer of any claim against the debtor by or to any petitioner?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Attach all documents that evidence the transfer and any statements required under Bankruptcy Rule 1003(a).		

13. Each petitioner's claim	Name of Petitioner	Nature of petitioner's claim	Amount of the claim above the value of any lien
	<u>See Rider 1</u>  _____ _____		\$ _____ \$ _____ \$ _____
		Total of petitioners' claims	\$ _____

If more space is needed to list petitioners, attach additional sheets. Write the alleged debtor's name and the case number, if known, at the top of each sheet. Following the format of this form, set out the information required in Parts 3 and 4 of the form for each additional petitioning creditor, the petitioner's claim, the petitioner's representative, and the petitioner's attorney. Include the statement under penalty of perjury set out in Part 4 of the form, followed by each additional petitioner's (or representative's) signature, along with the signature of the petitioner's attorney.

#### Part 4 Request for Relief

**WARNING** -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Petitioners request that an order for relief be entered against the debtor under the chapter of 11 U.S.C. specified in this petition. If a petitioning creditor is a corporation, attach the corporate ownership statement required by Bankruptcy Rule 1010(b). If any petitioner is a foreign representative appointed in a foreign proceeding, attach a certified copy of the order of the court granting recognition.

I have examined the information in this document and have a reasonable belief that the information is true and correct.

<b>Petitioners or Petitioners' Representative</b>	<b>Attorneys</b>
<b>Name and mailing address of petitioner</b>	
<u>Prudential Capital Partners IV, L.P.</u>	<u>Jason S. Brookner</u>
Name	Printed name
<u>180 N. Stetson Ave, Suite 5200</u>	<u>Gray Reed &amp; McGraw LLP</u>
Number Street	Firm name, if any
<u>Chicago</u>	<u>1601 Elm Street, Suite 4600</u>
City	Number Street
<u>Illinois</u>	<u>Dallas</u>
	City
<u>60601</u>	<u>Texas</u>
Zip Code	State
	<u>75201</u>
<b>Name and mailing address of petitioner's representative, if any</b>	
<u>Stephen F. Szejner</u>	<u>x /s/ Jason S. Brookner</u>
Name	Signature of attorney
<u>180 N. Stetson Ave, Suite 5200</u>	
Number Street	
<u>Chicago</u>	<u>Date signed 01/14/2021</u>
City	MM / DD / YYYY
<u>Illinois</u>	
<u>60601</u>	
Zip Code	
I declare under penalty of perjury that the foregoing is true and correct	
Executed on <u>01/14/2021</u>	
MM / DD / YYYY	
<u>* /s/ Stephen F. Szejner</u>	
Signature of petitioner or representative, including representative's title	

**Name and mailing address of petitioner****Prudential Capital Partners Management Fund IV, L.P.**

Name

**180 N. Stetson Ave, Suite 5200**

Number Street

**Chicago**      **Illinois**      **60601**  
City                        State                        Zip Code**Name and mailing address of petitioner's representative, if any****Stephen F. Szejner**

Name

**180 N. Stetson Ave, Suite 5200**

Number Street

**Chicago**      **Illinois**      **60601**  
City                        State                        Zip Code

I declare under penalty of perjury that the foregoing is true and correct

Executed on 01/14/2021

MM / DD / YYYY

\* /s/ Stephen F. Szejner

Signature of petitioner or representative, including representative's title

**Name and mailing address of petitioner****Prudential Capital Partners (Parallel Fund) IV, L.P.**

Name

**180 N. Stetson Ave, Suite 5200**

Number Street

**Chicago**      **Illinois**      **60601**  
City                        State                        Zip Code**Name and mailing address of petitioner's representative, if any****Stephen F. Szejner**

Name

**180 N. Stetson Ave, Suite 5200**

Number Street

**Chicago**      **Illinois**      **60601**  
City                        State                        Zip Code

I declare under penalty of perjury that the foregoing is true and correct

Executed on 01/14/2021

MM / DD / YYYY

\* /s/Stephen F. Szejner

Signature of petitioner or representative, including representative's title

**Jason S. Brookner**

Printed name

**Gray Reed & McGraw LLP**

Firm name, if any

**1601 Elm Street, Suite 4600**

Number Street

**Dallas**      **Texas**      **75201**  
City                        State                        Zip CodeContact phone 469-320-6132 Email jbrookner@grayreed.comBar number 24033684State Texas\* /s/Jason S. Brookner

Signature of attorney

Date signed 01/14/2021

MM / DD / YYYY

**Jason S. Brookner**

Printed name

**Gray Reed & McGraw LLP**

Firm name, if any

**1601 Elm Street, Suite 4600**

Number Street

**Dallas**      **Texas**      **75201**  
City                        State                        Zip CodeContact phone 469-320-6132 Email jbrookner@grayreed.comBar number 24033684State Texas\* /s/Jason S. Brookner

Signature of attorney

Date signed 01/14/2021

MM / DD / YYYY

**Name and mailing address of petitioner****Falcon Strategic Partners IV, LP**

Name

**21 Custom House Street, 10<sup>th</sup> Floor**

Number Street

<b>Boston</b>	<b>Massachusetts</b>	<b>02110</b>
City	State	Zip Code

**Name and mailing address of petitioner's representative, if any****Matthew L. White**

Name

**600 Lexington Ave, Floor 35**

Number Street

<b>New York</b>	<b>New York</b>	<b>10022</b>
City	State	Zip Code

I declare under penalty of perjury that the foregoing is true and correct

Executed on 01/14/2021

MM / DD / YYYY

\* /s/ Matthew L. White

Signature of petitioner or representative, including representative's title

**Jason S. Brookner**

Printed name

**Gray Reed & McGraw LLP**

Firm name, if any

**1601 Elm Street, Suite 4600**

Number Street

<b>Dallas</b>	<b>Texas</b>	<b>75201</b>
City	State	Zip Code

Contact phone 469-320-6132 Email jbrookner@grayreed.comBar number 24033684State Texas\* /s/ Jason S. Brookner

Signature of attorney

Date signed 01/14/2021

MM / DD / YYYY

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

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In re:	§ § Chapter 11 § § Case No. 21-[_____] (____) § § §
American Achievement Corporation	§
Debtor.	§
	§

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**Rider 1**

Petitioners declare under penalty of perjury that the foregoing is true and correct according to the best of their knowledge, information and belief.

<b>Name of Petitioner</b>	<b>Nature of Petitioner's Claim</b>	<b>Amount of the Claim Above the Value of Any Lien</b>
Prudential Capital Partners IV, L.P.	8.00% Senior Subordinated Notes	\$72,004,910.57
Prudential Capital Partners Management Fund IV, L.P.	8.00% Senior Subordinated Notes	\$3,648,084.34
Prudential Capital Partners (Parallel Fund) IV, L.P.	8.00% Senior Subordinated Notes	\$3,797,727.35
Falcon Strategic Partners IV, LP	8.00% Senior Subordinated Notes	\$44,412,484.30
<b>TOTAL AMOUNT</b>		<b>\$123,863,206.56</b>

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS

In Re:  
American Achievement Corporation  
Debtor(s)

§  
§  
§  
§ Case No.: 21-30058-hdh11  
Chapter No.: 11

## STANDING SCHEDULING ORDER REGARDING INVOLUNTARY CASES

A conference regarding entry of an **ORDER FOR RELIEF** has been scheduled in the above titled case on **2/22/2021 at 1:30 PM at the US BANKRUPTCY COURT, 1100 COMMERCE STREET, 14TH FLOOR, COURTROOM NO. 3, DALLAS, TEXAS, 75242**. The Petitioning Creditor(s) and Alleged Debtor(s) are required to appear.

### PART I. INSTRUCTIONS

1. The Petitioning Creditor(s) is responsible to ensure proper notice and shall serve the following on the Alleged Debtor(s): 1) a copy of this **ORDER**; 2) a fully completed **SUMMONS TO DEBTOR IN INVOLUNTARY CASE** form; and 3) a copy of the **PETITION**. The Petitioning Creditor(s) shall file a **RETURN** on the **SUMMONS TO DEBTOR** with a **CERTIFICATE OF SERVICE** which shall provide the name(s) and address(es) of each Alleged Debtor served and the manner of service.
2. Additional copies of the **PETITION** shall be filed in the number prescribed by the Clerk.
3. The Clerk shall issue one original **SUMMONS TO DEBTOR** form which shall be conformed by the Petitioning Creditor(s) for service on multiple Alleged Debtor(s).
4. All exhibits, except for impeachment documents, are to be marked with exhibit labels and exchanged with opposing counsel. When practicable, a copy of the marked exhibits shall be furnished to the Court. Parties will file a stipulation on which exhibits can be admitted without further proof, except for relevance.
5. The Court will consider the imposition of appropriate sanctions in the event of non-compliance with this Scheduling Order.

### PART II. SCHEDULE OF REQUIREMENTS AND DEADLINES

1. All cases scheduled for this **CONFERENCE** shall be prepared to discuss issues and trial setting, unless an Order Rescheduling the Conference has been entered by the Court prior to the conference.
2. Federal Rules of Bankruptcy Procedure 1010 requires that the **SUMMONS TO DEBTOR** be served with a copy of the **PETITION**. Federal Rules of Bankruptcy Procedure 7004(e) requires service of the **SUMMONS** be made within 7 days of issuance. The Court also directs that a copy of this **ORDER** be served with the **SUMMONS** and **PETITION**.

3. The Court further directs compliance with the following:

a. **A Joint Pre-Conference Statement shall be filed.** This document will contain all of the following and be incorporated in **one document**. The document is to be signed by all attorneys representing Petitioning Creditor(s) and Alleged Debtor(s).

**1) For the Petitioning Creditor(s):**

A statement of facts in support of entry of an **ORDER FOR RELIEF** and the evidence relied on to establish each of the facts contended.

**2) For the Alleged Debtor(s):**

A statement of facts in opposition to entry of an **ORDER FOR RELIEF** and the evidence relied on to establish each of the facts contended.

**3) For All Parties:**

- The date, time and location of counsels' meeting(s);
- A statement of stipulated facts;
- Each party's Statement of Contested Facts and Legal Issues; and
- A list of all motions, including dispositive motions, expected to be filed or that have been filed.

b. **At Docket Call for this Conference**, all parties and their counsels must certify to full compliance with this Order.

DATED: 1/15/21

FOR THE COURT:  
Robert P. Colwell, Clerk of Court

by: /s/J. Bergreen, Deputy Clerk